

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

GABBY KLEIN, et al., Individually and on	)	Civil Action No. 3:20-cv-00075-DJN
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiffs,	)	
	)	
vs.	)	
	)	
ALTRIA GROUP, INC., et al.,	)	
	)	
Defendants.	)	
_____	)	

**LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND  
EXPENSES AND AWARDS TO LEAD PLAINTIFFS  
PURSUANT TO 15 U.S.C. § 78u-4(a)(4)**

PLEASE TAKE NOTICE that Court-appointed Lead Counsel Pomerantz LLP and Robbins Geller Rudman & Dowd LLP will move this Court on March 31, 2022 at 12:00 p.m., before the Honorable David J. Novak, for entry of an Order, pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(4) (“PSLRA”), awarding: (i) Plaintiffs’ Counsel attorneys’ fees in the amount of 30% of the Settlement Amount, plus accrued interest; (ii) Plaintiffs’ Counsel litigation expenses in the amount of \$1,544,748.17, plus accrued interest; and (iii) \$68,775, in the aggregate, to Lead Plaintiffs in connection with their representation of the Settlement Class, as authorized by the PSLRA.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Counsel submit and are filing herewith: (i) Lead Counsel’s Memorandum of Law in Support of Motion for an Award of Attorneys’ Fees and Expenses and Awards to Lead Plaintiffs Pursuant to 15 U.S.C. §

78u-4(a)(4); and (ii) the Joint Declaration of Jeremy A. Lieberman and David A. Rosenfeld in Support of (1) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation of the Net Proceeds of the Settlement, and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards for Lead Plaintiffs Pursuant to 15 U.S.C. § 78u-4(a)(4).

A Proposed Order will be submitted with Lead Counsel's reply submission on or before March 24, 2022, after the deadlines for objecting and seeking exclusion have passed.

Respectfully submitted,

DATED: February 24, 2022

By: /s/ Steven J. Toll

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*Lead Counsel for Lead Plaintiff Laborers Pension  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2022, I caused the foregoing to be electronically filed with the Clerk of Court via CM/ECF, which will send a notice of electronic filing to all registered users.

/s/Steven J. Toll

Steven J. Toll